

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

**UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

\$19,629.00 IN U.S. CURRENCY
Defendant

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:10-CV-01218

ANSWER TO VERIFIED COMPLAINT FOR FORFEITURE IN REM

Jorfui Dolly Kandeh, by and through her attorney of record, Craig Pena, files this Answer to Verified Complaint for Forfeiture In Rem, and shows unto the Court:

1. Admit this is an action for forfeiture brought under 31 U.S.C. § 5317(c)(2) but deny this is a proper cause of action.
2. Admit factual scenario is accurate without admitting actions were appropriate.
3. Admit that this Court has jurisdiction, however, it is denied that Jorfui Dolly Kandeh, owner and/or bailee of the Defendant property committed any offenses within the jurisdiction of the Court.
4. Admit venue is proper in this Court under 28 U.S.C. §§ 1355 and 1395(a) but deny any acts or omissions by Jorfui Dolly Kandeh gave rise or need for any forfeiture action.
5. It is specifically denied that Defendant property is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2). It is also denied that Jorfui Dolly Kandeh committed any offenses in violation of 31 U.S.C. §§ 5316 and 5324(c).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via hand delivery and/or certified mail return receipt requested to the Assistant United States Attorney on June 25, 2010.

s/ Craig Pena _____
Craig Pena